

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

SNMP RESEARCH, INC. and SNMP)	
RESEARCH INTERNATIONAL, INC.,)	
Plaintiffs,)	
v.)	
)	Case No. 3:20-cv-451
Broadcom Inc.)	
Brocade Communications Systems LLC)	Jury Demanded
Extreme Networks, Inc.)	
)	
Defendants.)	

JOINT STATUS REPORT OF THE PARTIES

COME NOW, Plaintiffs SNMP Research, Inc. and SNMP Research International, Inc. (“Plaintiffs”) and Defendants Broadcom Inc., Brocade Communications Systems LLC, and Extreme Networks, Inc. (“Defendants”), by the undersigned counsel of record, and pursuant to the Court’s Memorandum and Order [Doc. 81] directing the parties to file a joint status report on the Motions to Seal [Docs. 2 and 50], do hereby advise the Court as follows:

1. The parties hereby agree that the following documents can be unsealed:
 - a. Complaint [Doc. 3-2]
 - b. Plaintiffs’ Opposition to Defendants’ Joint Motion to Dismiss Plaintiffs’ Complaint or Alternatively, to Transfer Venue [Doc. 51]
 - c. Plaintiffs’ Opposition to Extreme Networks, Inc.’s Motion to Dismiss Plaintiff’s Complaint or, Alternatively, to Transfer Venue [Doc. 51-1]
 - d. Unredacted copy of the Declaration of Dr. Jeffrey D. Case in Support of Plaintiff’s Opposition to Defendants Broadcom Inc.’s, Brocade Communication Systems LLC’s, and Extreme Networks, Inc.’s Rule 12(b)(2), Rule 12(b)(3), and Section 1404(a) Motions [Doc. 51-2]
 - e. Exhibit J to the Declaration of Dr. Jeffrey D. Case (CA Agreement) [Doc. 51-5]

2. Plaintiffs hereby request that only the pricing information in the following documents, which is highlighted in the exhibits attached to the contemporaneously-filed motion to seal, remain under seal. Defendants do not oppose Plaintiffs' request that this information be sealed, but Defendants do not independently request that it be sealed given that the documents above will be unsealed:

- a. Exhibit H to the Declaration of Dr. Jeffrey D. Case (Extreme Agreement) [Doc. 51-3].

The proposed redacted document is filed as Exhibit A to this report. Pursuant to the Memorandum and Order Regarding Sealing Confidential Information ("Memorandum and Order") [Doc. 11], an unredacted version of Exhibit A with all proposed redacted portions of the document highlighted is filed as Exhibit A to the motion to seal accompanying this report.

- b. Exhibit I to the Declaration of Dr. Jeffrey D. Case (Broadcom Agreement) [Doc. 51-4].

The proposed redacted document is filed as Exhibit B to this report. Pursuant to the Memorandum and Order, an unredacted version of Exhibit B with all proposed redacted portions of the document highlighted is filed as Exhibit B to the motion to seal accompanying this report.

- c. Exhibit A to the Complaint [Doc. 3-1]. Even though the court granted Plaintiffs' request to file the license agreement attached as Exhibit A to the Complaint under seal, pursuant to the authority referenced by the Court in its Order [Doc.81], Plaintiffs request that only the pricing information be redacted so that the license agreement may be freely quoted if needed in other filings. The proposed redacted document is filed as Exhibit C to this report. Pursuant to the Memorandum and Order, an unredacted version of Exhibit C with

all proposed redacted portions of the document highlighted is filed as Exhibit C to the motion to seal accompanying this report.

The pricing information in the documents above is commercially sensitive pricing information that Plaintiffs request be redacted. If competitors, customers, or potential customers of Plaintiffs had access to the pricing information, they could use it to gain leverage over the Plaintiffs.

Respectfully submitted this 8th day of September, 2021.

/s/ John L. Wood

John L. Wood, Esq. (BPR #027642)
Cheryl G. Rice, Esq. (BPR #021145)
Rameen J. Nasrollahi, Esq. (BPR #033458)
EGERTON, McAFEE, ARMISTEAD

& DAVIS, P.C.
900 S. Gay Street, Suite 1400
P.O. Box 2047
Knoxville, TN 37902
(865) 546-0500 (phone)
(865) 525-5293 (facsimile)
jwood@emlaw.com
crice@emlaw.com
rnasrollahi@emlaw.com

Morgan Chu (CA Bar. No. 70446)
David Nimmer (CA Bar. No. 97170)
A. Matthew Ashley (CA Bar. No. 198235)
Olivia L. Weber (CA Bar. No. 319918)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
(310) 277-1010 (phone)
(310) 203-7199 (facsimile)
mchu@irell.com
dnimmer@irell.com
mashley@irell.com
oweber@irell.com

Attorneys for Plaintiffs
SNMP RESEARCH INTERNATIONAL, INC. and
SNMP RESEARCH, INC.

/s/ Alison Plessman

Alison Plessman (CA Bar No.250631)
HUESTON HENNIGAN LLP

Attorneys for Defendants
Broadcom, Inc.
Brocade Communications Systems LLC

/s/ John M. Neukom

John M. Neukom (CA Bar No. 275887)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
515 University Avenue, Suite 1400
Palo Alto, California 94301
(650) 470-4500
john.neukom@skadden.com

Leslie A. Demers (NY Bar No. 5261904)
One Manhattan West
New York, New York 10001
(212) 735-3000
leslie.demers@skadden.com

Attorneys for Defendant Extreme Networks, Inc.